

**BEFORE THE JUDICIAL PANEL
ON MULTIDISTRICT LITIGATION**

IN RE: BAIR HUGGER
PRODUCTS LIABILITY LITIGATION

MDL- 2666

NOTICE OF POTENTIAL TAG-ALONG ACTION

Pursuant to Rule 7.1(a) of the Rules of Procedure of the Judicial Panel on Multidistrict Litigation (the “Rules”), Plaintiff Emma Mann, by and through the undersigned counsel, hereby gives notice to the Clerk of the Judicial Panel on Multidistrict Litigation (“the Panel”) of a “tag-along” action as defined in Panel Rule 1.1(h) that was filed in the United States District Court for the Middle District of Georgia, and styled as *Mann v. 3M Company.*, Case No. 7:15-cv-00208(WLS) A Schedule of Actions, a file-stamped copy of the Case Docket Sheet, and a file-stamped copy of the Complaint in this case are all attached hereto.

The tag-along action at issue shares common questions of fact with cases already transferred under Section 1407 and now part of the Multidistrict Litigation, MDL-2666. Specifically, Plaintiff Emma Mann alleges she has suffered injuries as a result of use of the Bair Hugger device that was manufactured by Defendant 3M Company, which is at issue in MDL-2666.

Defendant 3M has answered the complaint in the *Mann* case. No discovery has been taken.

Based on the foregoing, Plaintiff Emma Mann respectfully requests that the Panel transfer this tag-along action under Section 1407 to the United States District Court for the District of Minnesota, and consolidate it with the other actions pending in MDL-2666.

Respectfully submitted this 14th day of December, 2015.

/s/ Richard R. Schlueter

Richard R. Schlueter
Georgia Bar No. 629420
rschlueter@cssfirm.com

Childers, Schlueter & Smith, LLC
1932 N. Druid Hills Road
Suite 100
Atlanta, Georgia 30319
Tel. (404) 419-9500
Fax (404) 419-9501

CERTIFICATE OF SERVICE

I hereby certify that on December 14, 2015, a copy of the foregoing NOTICE OF POTENTIAL TAG-ALONG ACTION was filed electronically with the Clerk of the Court for the Judicial Panel on Multidistrict Litigation using the CM/ECF System. Notice of this filing will be sent to all counsel of record registered to receive by electronic service by operation of the court's electronic filing system, and by electronic and U.S. Mail to counsel for Defendant 3M Company, addressed as follows:

Dara D. Mann, Esq.
Dentons US LLP
303 Peachtree Street, NE
Suite 5300
Atlanta, Georgia 30309-3534
Dara.mann@dentons.com

Jerry W. Blackwell, Esq.
Mary S. Young, Esq.
Blackwell Burke P.A.
431 South 7th Street
Suite 2500
Minneapolis, MN 55415
Blackwell@blackwellburke.com
myoung@blackwellburke.com

/s/ Richard R. Schlueter
Richard R. Schlueter
Georgia Bar No. 629420
rschlueter@cssfirm.com
Childers, Schlueter & Smith, LLC
1932 N. Druid Hills Road
Suite 100
Atlanta, Georgia 30319
Tel. (404) 419-9500
Fax (404) 419-9501